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May 1, 2024

BY ECF

The Honorable Philip M. Halpern
United States District Judge
300 Quarropas Street
White Plains, New York 10601

Re: *Michael Giles v. City of Mount Vernon, et al.*, 20 CV 05119 (PMH)

Dear Judge Halpern:

I represent the plaintiff in the above referenced civil rights action. I write jointly with all counsel to request an enlargement of the parties' time to submit the revised pretrial documents required pursuant to the Court's April 4, 2024 Order (ECF Doc. 123), as well as defendants' response to plaintiff's motion for reconsideration (ECF Doc. 125), from today to May 8, 2024.

The reason for this request is that the parties are in the advanced stages of reaching a global settlement, which requires only final approval by the plaintiff. Due to difficulty reaching Mr. Giles today, as he is incarcerated in Bureau of Prisons custody, we request that the deadline to file the pretrial submissions be extended by one week to allow the undersigned sufficient time to reach Mr. Giles and for the parties to confirm if a global settlement agreement can be finalized, and further so that the parties and the Court will not be burdened with potential unnecessary filings. In this regard, my office has a brief in an unrelated matter due this Friday, and the Quinn firm has a trial starting on Monday before Judge Karas.

Should the Court be inclined to grant this request, it would not impact any other deadlines currently in place, including the next pretrial conference scheduled for May 21, 2024.

Thank you for your consideration.

Respectfully,

Brett Klein

Brett H. Klein

Application granted.

The Clerk of Court is respectfully directed to terminate the motion sequence pending at Doc. 128.

SO ORDERED.

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
May 2, 2024